



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

LHE/MPR
F. #2015R00138

*271 Cadman Plaza East
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September 3, 2015

By Federal Express and ECF

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Re: United States v. Kamel Lambus, et al.
Criminal Docket No. 15-382 (JBW)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This letter is intended to supplement the government's discovery letters dated August 20, 2015. Please consider this letter to be the government's renewed request for reciprocal discovery.

Enclosed please find the following:

- Draft summaries and transcripts for the audio recordings of intercepted calls over telephone number (347) 878-4421, which have been Bates numbered LAMBUS000720-8491. The audio for these calls was previously produced to you on DVDs marked PHONE 4421 001 – PHONE 4421 002.
- Draft summaries and transcripts for the audio recordings of intercepted calls over telephone number (347) 724-6075, which have been Bates numbered LAMBUS008491-9847. The audio for these calls was previously produced to you on a DVD marked PHONE 6075 001.
- Draft summaries and transcripts for the audio recordings of intercepted calls over telephone number (646) 327-3793, which have been Bates numbered LAMBUS009848-10105. The audio for these calls was previously produced to you on DVDs marked PHONE 3793 001.
- Draft summaries and transcripts for the audio recordings of intercepted calls over telephone number (917) 592-5283, which have been Bates numbered LAMBUS010106-10291. The audio for these calls was previously produced to you on DVDs marked PHONE 5283 001.
- Draft summaries and transcripts for the audio recordings of intercepted calls over telephone number (516) 770-2029, which have been Bates numbered LAMBUS10292-10295. The audio for these calls was previously produced to you on DVDs marked PHONE 2029 001.

These summaries and transcripts are drafts only, and are being produced to you exclusively for the purpose of preparing for trial, including the preparation of defense transcripts. Copies of the enclosed summaries and transcripts, as well as copies of the corresponding audio calls, are being contemporaneously provided to those defendants who are in custody.

Also enclosed are:

- A DEA laboratory report reflecting chemical analysis of heroin acquired from defendant SCOTT WILLIAMS by a confidential source on or about November 10, 2014, which has been Bates numbered LAMBUS10296.
- A DEA laboratory report reflecting chemical analysis of heroin acquired from defendant EARL DAVIS by a confidential source on or about December 15, 2014, which has been Bates numbered LAMBUS10297.
- A DEA laboratory report reflecting chemical analysis of heroin acquired from defendant EARL DAVIS by a confidential source on or about January 7, 2015, which has been Bates numbered LAMBUS10298.
- A DEA laboratory report reflecting chemical analysis of heroin acquired from defendant SEAN BRABRAM by an undercover agent on or about February 11, 2015, which has been Bates numbered LAMBUS10299.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

KELLY T. CURRIE
Acting United States Attorney

By: /s/ Lauren Howard Elbert
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Enclosures

cc: Clerk of the Court (JBW) (by ECF) (without enclosures)